IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

Maya Crosby and Deneen Patton, on behalf of themselves and all those))
similarly situated,) Case No. 18-cv-00503
Plaintiff,	District Judge Waverly D. Crenshaw, Jr.
v.) Magistrate Judge Alistair Newbern
Stage Stores, Inc.,))
Defendant.))
)

DECLARATION OF EDDIE MILLER IN SUPPORT OF DEFENDANT'S RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION FOR CORRECTIVE NOTICE

- I, Eddie Miller, do hereby swear, affirm, and attest as follows, based upon my personal knowledge of the matters contained herein:
- 1. I am over 18 years of age and competent to testify to the matters stated in this declaration. I make this declaration based upon my personal knowledge and if called upon to testify in this regard could do so both accurately and competently. This declaration is given voluntarily. I have not been promised any benefit, been coerced, or threatened in any manner in exchange for the testimony in this declaration.
- 2. I am currently employed by Stage Stores, Inc. as a Regional HR Manager for Region 2, which contains the state of Texas and Store #130, the Bealls location in Round Rock, Texas. I have held this position since June 8, 2015. In my role, among other things, I am responsible for conducting investigations associated with employee complaints. I have undergone training with respect to conducting investigations into allegations of management misconduct and I have conducted numerous investigations along these lines.

- 3. On or around March 5, 2019, Tim Moyer, Stage's Vice President of Human Resources, asked me to interview hourly associates at Store #130, as part of an investigation regarding allegations that store management had been discouraging hourly employees from participating in this lawsuit.
- 4. Between March 5, 2019 and March 10, 2019, I interviewed all but three hourly associates on the Round Rock, Texas store's payroll. I did not ask the employees if they had opted in to the case during these interviews, nor did I ask employees if they were planning to do so. I did assure each employee that whether to participate in the lawsuit was their decision and that Stage would not tolerate any retaliatory conduct as a result of any employee's participation in the lawsuit.
- 5. Every associate with whom I spoke denied that any Store or District manager said anything to them about them not being able to participate in the lawsuit or otherwise discouraging participation in the lawsuit. Each associate also denied any retaliatory conduct on the part of any Store or District Manager.
- 6. With the exception of two associates who are on leave of absence, I have conducted additional interviews since March 10 and have now have spoken to all but one associate on the Round Rock, Texas store's payroll. Again, every associate with whom I spoke denied that any Store or District Manager said anything to them about employees not being able to participate in the lawsuit or otherwise discouraging participation in the lawsuit. They also denied any retaliatory conduct.
- 7. I have received no complaints from any associate in my region that Store Managers or District Managers are discouraging participation in this lawsuit or retaliating against employees for participating in this lawsuit.

PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT.

Signature:	Eddie Miller Eddie Miller (Apr 5, 2019)		Date:	Apr 5, 2019
Ū		Eddie Miller		

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CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2019, I electronically filed the foregoing Declaration Of Eddie Miller In Support Of Defendant's Response In Opposition To Plaintiffs' Motion For Corrective Notice, along with Defendant's Response In Opposition To Plaintiffs' Motion For Corrective Notice, the Declaration Of John H. Lassetter In Support Of Defendant's Response In Opposition To Plaintiffs' Motion For Corrective Notice, and the Declaration Of Timothy Moyer In Support Of Defendant's Response In Opposition To Plaintiffs' Motion For Corrective Notice, and , and the with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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s/John H. Lassetter

John H. Lassetter